UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 19-CR-227-1-LJV

JOSPEPH BONGIOVANNI,

v.

Defendants.

NOTICE OF MOTION

Moving Party: Defendant Joseph Bongiovanni

Date and Time: July 15, 2025 at 9:30 a.m.

Place: Hon. Lawrence J. Vilardo

U.S. Courthouse 2 Niagara Square

Buffalo, New York 14202

Supporting Papers: Memorandum of Law, dated June 28, 2025, and Exhibit A

(Filled Under Seal)

Relief Requested: An Order: 1) Granting defendants' Motion for Further

Inquiry into Allegations of Juror Misconduct in Trial #1; and, 2) Granting defendant's Motion to Seal the Accompanying Memorandum of Law as it discusses the contents of a

Previously Sealed Document (ECF 1568).

Dated: June 28, 2025

Williamsville, New York

SINGER LEGAL PLLC

Attorneys for Defendant Joseph Bongiovanni

By: s/Robert C. Singer, Esq.

Robert C. Singer, Esq.

80 E Spring Street

Williamsville, New York 14221

(716) 222-3288

rob@singerlegalpllc.com

TO: United States Attorney's Office for the Western District of New York

Counsel for Plaintiff United States of America Joseph Tripi, Esq. Nicholas Cooper, Esq. Casey Chalbeck, Esq. 138 Delaware Avenue Buffalo, New York 14202 (716) 843-5700